

# **EXHIBIT**

# **B**

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 19-cv-03377-LAP

VIRGINIA L. GIUFFRE,  
Plaintiff,

vs.

ALAN DERSHOWITZ,  
Defendant.

\_\_\_\_\_/

REMOTE

DEPOSITION OF: Rebecca Boylan

DATE TAKEN: October 18, 2021

TIME: 11:20 a.m. - 1:54 p.m.

PLACE: Zoom Video Conference

TAKEN BEFORE: Derron Ross, Court Reporter  
And Notary Public State of Florida

TRANSCRIBED BY: Glenn Reed

\* \* \* \* \*

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1     you know, she hinted. I mean, it became obvious to me,  
2     you know, that he was buying her lots of things, and  
3     taking her on shopping sprees. And, you know, she had,  
4     you know, like little spa days. You know, things like  
5     that, to that nature.

6           Q. Did she seem to enjoy all of that?

7           A. Yeah. Yes, she did.

8           Q. Did she tell you she enjoyed all of it?

9           A. Yes, she did.

10          Q. Now at some point Ms. Giuffre moved and the  
11     two of you fell out of touch for a while.

12                   Is that right?

13          A. Yes.

14          Q. Do you recall how old you were or what year it  
15     was?

16          A. I believe we fell out of touch probably I was  
17     20, so she would have been 20 or 21. It was after she  
18     got married to Robbie is when we fell out of touch.

19          Q. So that would have been in 2002,  
20     approximately?

21          A. Yes.

22          Q. Now, during the period of time that the two of  
23     you fell out of touch in some point in 2002.

24          A. Mhm.

25          Q. Did she ever tell you that she was being

1     abused by anyone?

2             A.     No.

3             Q.     Did she ever tell you that she was being  
4     forced to have sex with anybody?

5             A.     No, never.

6             Q.     Did she ever tell you or ever bring up the  
7     name Alan Dershowitz to you?

8             A.     No, never.

9             Q.     Did she ever claim to you during that period  
10    of time to be a victim of anybody?

11            A.     No.

12            Q.     Did she ever tell you that she was recruiting  
13    girls for Mr. Epstein?

14            A.     No. She never told me that, but she, in a  
15    way, tried to recruit me at one point.

16            Q.     What did she do?

17            A.     She told me that Jeffrey needed, Mr. Epstein,  
18    needed someone to answer the phone at one of his offices  
19    or something like that. I remember it was answering the  
20    phone.

21            Q.     Did she tell you it involved anything else?

22            A.     No, she did not.

23            Q.     And this was a period of time where the two of  
24    you were close friends?

25            A.     Yes.

1     you and Ms. Giuffre lost touch with each other, did she  
2     ever mention an individual by the name of Leslie Wexner?

3             A.     Sorry. Say that again.

4             Q.     Okay. I'm still focused on the, I know I went  
5     ahead.

6             A.     Yeah.

7             Q.     Now, I'm going back.

8             A.     Okay.

9             Q.     Sometimes lawyers forget to ask questions.  
10     So, during the time period.

11            A.     Uh-huh.

12            Q.     Before you lost touch with her.

13            A.     Okay.

14            Q.     Did she ever mention to you a gentleman by the  
15     name of Leslie Wexner?

16            A.     No.

17            Q.     Or tell you that she had been forced to have  
18     sex with Mr. Wexner?

19            A.     No.

20            Q.     Did she say anything about having met the  
21     owner of a company called Victoria's Secret?

22            A.     Not at that time?

23            Q.     Or Limited Too?

24            A.     No.

25            Q.     So, as I understand it, by the time that you

1 had lost touch with Ms. Giuffre in 2002, she had never  
2 mentioned Mr. Dershowitz, she had never mentioned Mr.  
3 Wexner, and had never claimed to be a victim.

4 Correct?

5 MR. KIRK: Objection to the form of the  
6 question.

7 THE WITNESS: Yes, correct.

8 BY MR. COOPER:

9 Q. Now, what types of things did you observe Mr.  
10 Epstein, or strike that. Withdrawing.

11 What types of things did you observe Ms.  
12 Giuffre to have that she told you had been bought for  
13 her by Mr. Epstein?

14 A. The apartment she was living in. Everything  
15 in the apartment. Her clothes. I remember she had gone  
16 on a trip to New York, and she had bought me some stuff  
17 while she was, you know, traveling to New York. He paid  
18 for everything at that time.

19 Q. And did Ms. Giuffre seem upset with having all  
20 these things?

21 A. No. She seemed very happy and excited.

22 Q. Did she brag about it?

23 A. Absolutely did, yes.

24 Q. Did she brag about it to you?

25 A. Yes.

1           Q.    And was this the first time you had ever heard  
2   about some alleged ring?   From her?

3           A.    Yes.

4           Q.    In other words, back when she was with Mr.  
5   Epstein, she never said anything about that to you.

6                    Correct?

7           A.    No, she did not.

8           Q.    Were you following it at all in the media what  
9   was going on?

10          A.    Not at first, but after, once it started  
11   getting to be real, like big news, yes.

12          Q.    And did she tell you what it was that she was  
13   looking for in going after Mr. Epstein and his ring?

14          A.    Yes, she did.

15          Q.    And what did she say?

16          A.    She said that she was going to make all of  
17   them pay.   She was going to make all the monsters pay,  
18   was pretty much as she said it.

19          Q.    Pay money?

20          A.    Yes.

21          Q.    So, she told you she was doing this for money?

22          A.    In so many words, yes.

23          Q.    Now, I want to focus on the time period now  
24   after the two of you were back in touch.

25          A.    Okay.



1 Q. When did you last talk to Ms. Giuffre?

2 A. When we, when would have been the last time?

3 I guess it would have been like 2014, maybe.

4 Q. Would it refresh your memory if I suggested  
5 that you and your husband reached out to Professor  
6 Dershowitz in April of 2015?

7 A. Okay. Yeah, so probably, it was in 2015,  
8 then.

9 Q. Now, between the time that you and Ms. Giuffre  
10 resumed your friendship, and the time that you stopped  
11 talking with each other in 2015.

12 A. Right.

13 Q. Did Ms. Giuffre mention anything to you about  
14 a rich guy in Ohio?

15 A. She mentioned to me about a, I don't remember  
16 Ohio, but a man that owned Victoria's Secret, Limited  
17 Too, these, you know, clothing stores.

18 Q. And what did she say?

19 A. That he had lots of money, and they were going  
20 to be going after him, and it would be a lot of money.

21 Q. On how many occasions did she say that to you?

22 A. I could say for sure at least two times, for  
23 sure.

24 Q. And are you able to be more specific about  
25 what she said or is that your best memory?

1           A.     That would be my best memory, just that he,  
2     the businesses that he owned, that he was worth, I  
3     think, I remember her saying he was worth like a billion  
4     dollars or eleven million. I can't remember. But I  
5     remember her telling me like a net worth. But, yeah,  
6     other than that, no.

7           Q.     And what, if anything, did she say about how  
8     much she intended to get from that person?

9           A.     I don't, I guess, I don't remember her quoting  
10    like an actual number, but just getting him for all he  
11    was worth.

12          Q.     Did she tell you why she was going after him  
13    or on what basis?

14          A.     Not exactly, no. That he was one of  
15    Jeffrey's, you know, inner circle. You know, one of  
16    his, I don't know what you want to call it, what you  
17    call them.

18          Q.     What's important here is your memory. What  
19    you understood.

20          A.     One of Jeffrey's, you know, guys that he would  
21    lend girls out to.

22          Q.     And did she leave you with the impression that  
23    she had been lent out to Mr. Wexner?

24          A.     No.

25          Q.     Did she leave you with the opposite

1 California.

2 MR. KIRK: Objection, and move to strike the  
3 answer as hearsay.

4 BY MR. COOPER:

5 Q. Did Ms. Giuffre later confirm that for you?

6 A. I can't recall if she did, no.

7 Q. Now, just so I'm clear about what Ms., let me  
8 do this differently.

9 As you sit here today, is it your  
10 understanding that the businessman, the Victoria's  
11 Secret, Limited Too businessman that Ms. Giuffre was  
12 referring to, has a name and it's Leslie Wexner?

13 A. Yes, I understand that now, yes.

14 Q. But back at the time you didn't know the name?

15 A. No.

16 Q. And she didn't tell you a name?

17 A. No.

18 Q. She just described this businessperson who was  
19 the owner of those companies?

20 A. Yes, correct.

21 Q. And during the time when she was telling you  
22 about it, after the two of you had reconnected, she  
23 never suggested to you that she had had sex with Mr.  
24 Wexner, did she?

25 A. No, she did not.

1 there was going to be --

2 Q. Wait. I need to ask you a question.

3                   What did she say to you?

4           A.     She said that I never wanted to go after Alan.

5 That she had felt pressured by her lawyers to go after

6 Alan.

7 Q. Did she tell you who her lawyers were?

8           A.    She may have, but I don't remember.

9 Q. If I suggested the name David Boies to you,  
10 does that refresh your memory?

11                      A.       No.

12 Q. What about the name Sigrid McCawley?

13                      A.                      No.

14 Q. You just don't have a memory of her giving you  
15 the names of lawyers?

16                   A.     No, I don't.

17 Q. Now, as of the time she said this to you, she  
18 had never told you that she had sex with Alan  
19 Dershowitz, had she?

20           A.    No, she never had.

21 Q. And she never told you she had even met him.

22                      Correct?

23           A.     Correct, yes.

24 Q. Now, did she, strike that.

25 Do you remember where, strike that too.

1           On how many occasions to the best of your  
2   memory did she tell you that she hadn't wanted to go  
3   after Alan Dershowitz, but her lawyers pressured her?

4           A.   How many occasions? I would say two  
5   occasions.

6           Q.   And do you recall where you were?

7           A.   On the phone, I believe for the first time,  
8   and either out to dinner or, yeah dinner, or at my  
9   parents' house.

10          Q.   And what was your reaction to hearing what she  
11   said, if any?

12          A.   I kind, to her? I can't remember, to be  
13   honest. I do remember, I feel like things, I do  
14   remember things getting heated with her and Robbie about  
15   it. I feel like they were fighting a lot when it came  
16   to like what was going on with all the lawyers. I  
17   actually had a conversation with Robbie at one point  
18   over the phone. He was getting very frustrated and just  
19   wanted to go back home and was saying that, you know,  
20   that the same thing, that, you know, he felt that they  
21   were pressuring Virginia to go after all these people,  
22   and it was just. My impression was she was kind of  
23   getting in over her head with all of it.

24           MR. KIRK: Objection. Move to strike. It's  
25   hearsay and lacks foundation

1                   Through the time as you sit here today.

2           A.    Mhm.

3           Q.    Did Ms. Giuffre ever describe to you that she  
4    had sex with Professor Dershowitz?

5           A.    No, never.

6           Q.    Did she ever describe to you that she had even  
7    met Mr. Dershowitz?

8           A.    No.

9           Q.    And this was even after the two of you were  
10   back in touch.

11                   Right?

12          A.    Yes.  Mhm.

13          Q.    And so you simply learned that she was making  
14   these allegations against him that you had never heard  
15   from her?

16          A.    Yes.

17          Q.    Your dear friend?

18          A.    Yes, I never, never heard from her say  
19   anything about Alan when we were kids.  The only time I  
20   heard about is when the media broke, so that's about it.

21          Q.    And when she told you that she had been  
22   pressured by her lawyers?

23                   BY MR. KIRK:  Objection to the form of the  
24   question.

25   BY MR. COOPER:

1           A.    I'm a meat cutter.

2 Q. And that's in addition to taking care of your  
3 children?

4                    A.     Yes.

5 Q. And I assume your husband works full time as  
6 well?

7 A. Correct, yeah.

8            Q.     Do you guys work hard?

9                   A.     Yes.

10 Q. Did you ever receive a penny from Professor  
11 Dershowitz or anyone on his behalf related to anything  
12 you talked to him about?

13           A.     No, absolutely not.

14 Q. Has he ever offered you anything?

15                      A.       No.

16            Q.     Are you lying?

17                      A.           No.

18 Q. Is it difficult for you to testify about your  
19 best friend growing up?

20                   A.     Yes.

21 Q. Based upon everything she said to you about  
22 Professor Dershowitz, it is fair to say that you came  
23 away with the conclusion that she's lying.

24 Correct?

25 MR. KIRK: Objection to the form of the

1 question. Lack of foundation.

2 THE WITNESS: Yes.

3 BY MR. COOPER:

4 Q. And is that why you reached out to Professor  
5 Dershowitz, you and your husband?

6 A. Yes.

7 Q. Because you both concluded that she's lying?

8 MR. KIRK: Objection.

9 THE WITNESS: Yes.

10 BY MR. COOPER:

11 Q. Now, you were asked about a reference to pro  
12 bono work on the back page of the first page of Exhibit  
13 6.

14 I just want to direct your attention to  
15 something that Mr. Kirk didn't ask you about that's  
16 immediately above your answer regarding pro bono work.  
17 You actually had started to read it, but he told you  
18 that wasn't what he wanted you to read.

19 Do you see where it says that there's a  
20 discussion about contributing \$80,000 to the charity?

21 A. I see that, yes.

22 Q. Okay. When you were being asked by Professor  
23 Dershowitz what pro bono work was being done, he was  
24 asking you about the lawyers doing work for the charity.

25 Correct?